

## REMARKS

Claims 1-19 are pending in the application, and were rejected as follows:

Claims / Section	35 U.S.C. Sec.	References / Notes
7, 15	§112, First Paragraph	<ul style="list-style-type: none"><li>• Enablement of "inversely related" language</li></ul>
1-17	§103(a)	<ul style="list-style-type: none"><li>• Pirolli et al. (U.S. Patent No. 5,895,470); and</li><li>• Hoppe, et al. (U.S. Patent No. 5,515,488).</li></ul>
18 and 19		<ul style="list-style-type: none"><li>• Note: the Examiner did not include these claims in his Office Action—they were added by the RCE/Amendment</li></ul>

Applicant responds by canceling claims 7 and 15, and providing discussion  
5 for distinguishing the present invention from the art cited against it. Applicant respectfully requests that claims 18 and 19 be addressed by the Examiner.

### **35 U.S.C. §112, First Paragraph, Claims 7, 15**

1. *Applicant has cancelled claims 7 and 15.*

Applicant respectfully asks that the 35 U.S.C. §112 rejection be withdrawn  
10 from the application, since the claims the rejection were based on have been cancelled.

### **35 U.S.C. §103(a), Claims 1-17 Obviousness over Pirolli, et al. in view of Hoppe**

2. *There is no teaching or motivation to combine Pirolli with Hoppe because  
the objects that are displayed in Pirolli represent individual documents, and objects  
15 that are displayed in Hoppe represent entire sets of information from a search result,  
which are two very different things.*

In the OA the Examiner acknowledges, at the top of p. 4, that the display of  
"respective symbols of said other documents" is not explicitly shown in Pirolli. The

Examiner goes on to say that Hoppe discloses a graphical visualization of iconic representations of a search result including each icon having its own characteristic.

The Examiner then states that it would have been obvious to one having ordinary skill in the art at the time the invention was made to "incorporate the visualization,

5 the displaying of iconic representation technique with Pirolli because the visualization technique could be used to provide an interactive overview of web localities that facilitates navigation suggested by Pirolli...."

Applicant respectfully contends that there is no teaching or motivation to combine these two references to produce the inventive result. The entity that his

10 displayed graphically in Hoppe represents attributes of a set of documents not a single document as indicated by Pirolli and as required by the present invention. Hoppe states at 10/42 that in Fig. 8, the Venn diagram includes circles 805 -807, which correspond to the results of search and expressions 801--803, respectively. These graphical representations are not individual documents.

15 Furthermore, according to Hoppe, the attributes represented by the graphical illustrations do not correspond to a relationship with one another, as required by the present invention, but rather correspond to relationship of an associated search and expressions. Hoppe states, at 10/45, that the number of documents satisfying the search expressions of the corresponding circle is indicated by its size by a number  
20 contained in the circle or both, and that each of the circles may also contain a list of or some iconic representation of the documents satisfying the corresponding search expressions.

This clearly is not a document to document comparison as required by the invention, and one would not consult this reference in order to arrive at the present  
25 invention when viewing Pirolli. There are a myriad of ways of visually representing

relationship information on a screen, and the inventive use of augmenting symbols representing the documents themselves and their relationship to some starting document is not obvious. The mechanisms one would use to combine Hoppe's set-based objects (where the graphical fill relates to some arbitrary search criteria) with  
5 the objects displayed in Pirolli to produce the present invention are quite difficult to envision. The use of Hoppe's set-related display objects to provide an element of the present invention describing document-related display objects represents the precise type of hindsight analysis that is not permitted under 35 U.S.C. §103.

Since neither the objects being displayed in Hoppe nor the attributes  
10 reflecting a document or a degree of similarity measure, one would not turn to Hoppe after reviewing Pirolli in order to find the solution to displaying a document whose graphical form relates to a degree of similarity to other documents according to the present invention. The present invention provides a new way of displaying document relationships that is not taught or suggested by any combination of the  
15 prior art references.

For these reasons, Applicant asserts that the present invention is clearly distinguished over the combination of Pirolli and Hoppe, and respectfully requests that the Examiner withdraw the §103 rejection from the present application.

## CONCLUSION

Inasmuch as each of the objections have been overcome by the cancellation of claims and discussion presented above, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

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## CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on February 12, 2003.

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